Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Amendment of Part 97 of the Commission's Rules to Set Aside a portion of the Amateur 222 to 225 MHz Band for Other than Repeater Use, and to Amend the Rules Relative to Novice Privileges	)))))))	PR Docket 92-289

COMMENTS OF David A. Phillips W7GZ

I have been a licensed radio amateur since 1971 and hold the Extra Class license. Although I operate nearly all amateur bands from 160 meters to 24 GHz, my primary interests lie with the higher frequency bands above 50 MHz, including the 222 MHz band.

I strongly support the Commission's proposal to reserve a portion of the 222 to 225 MHz band for non-repeater use. I believe that a portion of this band must be universally available for weak signal/non-FM experimentation. Without action by the Commission setting aside a small portion of the band for weak signals, the squabbling over frequencies on 222 MHz will continue forever.

Many VHF amateurs regularly use the 222 MHz band for long-distance terrestrial communication because the wavelength of the band is favored by propagation modes such as troposcatter, meteor-scatter, aurora, and Earth-Moon-Earth (EME). However, since the Commission's re-allocation of 220 to 222 MHz to the Land Mobile Service, the opportunity for such experimentation has declined as little space for weak signal operation remains in many urban localities. The Commission's proposal to reserve a small portion of the 222 to 225 MHz band for non-repeater use will greatly facilitate the weak signal experimentation described above.

Prior to the loss of 220 to 222 MHz, the Commission's rules prohibited FM repeater stations from using the 220.0 to 220.5 MHz band segment. This area was also established in the ARRL band plan for CW, SSB and similar narrow-band modulations only. Since the Commission's action revoking our use of 2 MHz of the band, the owners of open and closed repeater systems, control links, and private remote bases have refused to relinquish a segment of the new band for weak signal operation. Groups of repeater operators, particularly an association in southern California, have parceled out into effectively private ownership the remaining 3 MHz of the band so that only a minimal displacement of FM and repeater stations from the prior status quo occurred. This group believes that only repeater operations can be accommodated in the remaining segment, granting just a 10 KHz window for weak signal between repeater stations.

This is hardly a workable solution from the point of view of the weak signal operator, who is trying to pull weak CW/SSB signals from underneath the FM sidebands of strong local repeaters. For example,

the 2M EME segment is essentially useless in my area because of sidebands from a mountaintop CAP repeater on 143.990 MHz. For those of us in Arizona and other southwestern states, the weak-signal hams in California constitute a large percentage of the operators to work on 222 MHz. If they are forced off the air by the repeater groups, weak signal activity on 222 MHz is doomed here in the West because of the low population density. I have invested a lot of money in my 222 MHz equipment -- I do not want to give up operation on the band.

I feel the Commission must look at one other aspect of what is happening in southern California. A weak signal segment is available to everyone with narrow-mode equipment -- just pick an empty frequency and talk. On the other hand, repeater/remote base frequencies are effectively privatized. They "belong" to the person or group providing the repeater equipment, and woe to anyone outside the group who attempts to use a "closed" repeater or who uses a "coordinated" frequency for CW/SSB. You are verbally abused by the "owners" of the frequency for doing so. Weak signal operators in California have had their transmissions jammed by FM users who do not wish to share spectrum within the proposed window which was "coordinated" by groups such as the Spectrum Management Association, who, I might add, do not take input from non-repeater users of the spectrum. Voluntary allocation of weak-signal windows has not worked because of these repeater owners. This selfishness is foreign to all that ham radio has historically been about.

Just as the President's economic plan requires shared sacrifice by everyone, all of us who are users of the 222 MHz band must share in the loss of spectrum so that each can continue to have access to the band. Since 40% of the band was lost to amateur use by the reallocation, equitable sharing implies that each mode of operation retain 60% of their previous allocation. In the referenced NPRM (following ARRL Petition RM-7869), the Commission proposes 150 KHz for non-repeater operations, accounting for only 30% of the 500 KHz previously available to weak signal modes. A 60% allocation would have permitted a 300 KHz weak-signal window. FM and repeater operations retain about 63% of their previous spectrum under the NPRM, an allocation which is fair to the repeater groups. As stated above, weak signal operations require buffer space from FM modes, and the CW/SSB segment should not be further reduced, as proposed in some alternate plans.

Again, I support the NPRM and urge you to approve it on behalf of ALL radio amateurs using the 222 MHz band. Every other band has a weak-signal window, why should 222 MHz be any different?

Respectfully Submitted,

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